

LAWRENCE A. ORGAN (SBN 175503)  
larry@civilrightsca.com  
NAVRUZ AVLONI (SBN 279556)  
navruz@civilrightsca.com  
CIMONE A. NUNLEY (SBN 326915)  
cimone@civilrightsca.com  
CALIFORNIA CIVIL RIGHTS LAW GROUP  
332 San Anselmo Avenue  
San Anselmo, California 94960  
T: (415)-453-7352 | F: (415)-785-7352

J. BERNARD ALEXANDER (SBN 128307)  
ALEXANDER KRAKOW + GLICK LLP  
1900 Avenue of the Stars, Suite 900  
Los Angeles, California 90067  
T: (310) 394-0888 | F: (310) 394-0811

Attorneys for Plaintiffs,  
OWEN DIAZ

SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP  
TRACEY A. KENNEDY (SBN 150782)  
NAMAL TANTULA (SBN 247373)  
BRETT YOUNG (SBN 305657)  
333 South Hope Street, 43<sup>rd</sup> Floor  
Los Angeles, California 90071-1422  
T: 213.620.1780 | F: 213.620.1398  
tkennedy@sheppardmullin.com  
ntantula@sheppardmullin.com

PATRICIA M. JENG (SBN 272262)  
SUSAN HAINES (SBN 224611)  
Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, California 94111-4109  
T: 415.434.9100 | F: 415.434.3947  
pjeng@sheppardmullin.com  
shaines@sheppardmullin.com

Attorneys for Defendant,  
TESLA, INC. dba TESLA MOTORS, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DEMETRIC DI-AZ, OWEN DIAZ  
AND LAMAR PATTERSON

Plaintiffs,

v.

TESLA, INC. DBA TESLA MOTORS,  
INC., CITISTAFF SOLUTIONS, INC.;  
WEST VALLEY STAFFING GROUP;  
CHARTWELL STAFFING  
SERVICES, INC.; NEXTSOURCE,  
INC.; and DOES 1-10, inclusive

Defendants.

Case No. 17-cv-06748-WHO

**JOINT TRIAL EXHIBIT LIST**

Trial Date: June 8, 2020  
Complaint filed: October 16, 2017

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
001	Racist Drawing, 1-21-2016	ODIAZ000008	Owen Diaz		Authentic Admissible		
002	Racist Drawing Close up, 1-21-2016	ODIAZ000009	Owen Diaz		Authentic		
003	TESLA Master Services Agreement with NextSource, 5-28-2013	TESLA-0001014-1046	Chuck Shehadi		Authentic		
004	WVSG Agreement for Tesla; <b>Wetle Depo: p.148:13-150:5</b> (Depo Exhibit 2)	WV000051-63	Rovilla Wetle		Authentic	<a href="#">Δ349</a>	
005	Rovilla Wetle email re Demetric Di-az dates; Wetle email exchange with Josh Hedges and Carmen Copher Re clarification of Demetric Di-az work at Tesla, 10-5-2017 (Depo Exhibit 3)	WV000137-138	Rovilla Wetle		Authentic	<a href="#">Δ369</a>	
006	TESLA Anti-Handbook Handbook, (Depo Exhibit 62)	TESLA-0000211-214	Annalisa Heisen (Tesla PMK)		Authentic		
007	WVE Employment Info for Demetric Di-Az (Depo Exhibit 6)	WV000001-6	Rovilla Wetle		Authentic		
008	Demetric Di-Az online Tesla Application, 8-11-2015 (Depo Exhibit 7)	TESLA-0000157-162	Rovilla Wetle? Demetric Diaz		Authentic		
009	West Valley Timesheet for Demetric Di-az, week ending 2015.8.30-2015.10.25 (Depo Exhibit 8)	V0000041-49	Demetric Diaz		Authentic		
010	WVSG Payroll for Demetric Di-az (Depo Exhibit 9)	V0000029-37	Rovilla Wetle? Demetric Diaz	Former Plaintiff Demetric Di-az's pay stubs not relevant to Plaintiff's claims. FRE 401-402.			
011	Rovilla Wetle email re Demetric safety training, 5-18-2018 (Depo Exhibit 10)	V0000129	Rovilla Wetle	Whether former Plaintiff			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
				Demetric Di-az attended safety training not relevant to Plaintiff's claims. FRE 401-402.			
012	Monica DeLeon email to Ludivina Ledesma Re Racist Effigy and Drawing, 1-16-2016	CitiStaff-0000050-55	Monica DeLeon		Authentic	<a href="#">Δ292</a>	
013	Gleason email Re Juan and Javier response to Demetric safety issues, 10-11-2015 (Depo Exhibit 12)	WV0000133-136	Rovilla Wetle		Authentic		
014	Juan Martinez email agreeing to ending Di-Az contract, 10-20-2015 (Depo Exhibit 13)	WV0000098-99	Rovilla Wetle		Authentic Admissible		
015	Quintero email to Romero re Owen, 2-29-2016	TESLA-0000314-316	Quintero or Romero		Authentic	<a href="#">Δ300</a>	
016	Wetle forwards Javier Caballero email re Demetric termination timing, 10-31-2015 (Depo Exhibit 15)	WV0000156-159	Rovilla Wetle		Authentic Admissible		
017	Lamar Patterson email to Owen, 2-26-2016 (L Peterson Depo Exhibit 10)	ODIAZ000209 modified to <a href="#">ODIAZ 206-209</a>	Lamar Patterson			<a href="#">Δ245</a> (agree to Δ #s)	
018	Zehner response to Wetle re Demetric report to Javier, 9-22-2015 (Depo Exhibit 17)	WV0000068	Rovilla Wetle	Person to whom former Plaintiff Demetric Di-az was to report not relevant to Plaintiff's			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
				claim. FRE 401-402.			
019	Owen's Tesla ID (O. Diaz Depo Exhibit 37)		Owen				
020	Expert report of Charles Mahla			Purported expert report is inadmissible hearsay not within any exception. FRE 801-802, 807.			
021	Tesla contractor EHS guidelines, 12-21-2015 (L Peterson Depo Exhibit 8)	CSS9	Patterson	Former Plaintiff Lamar Patterson's signed guidelines irrelevant to Plaintiff's claims. FRE 401-402.			
022	Email from Phillip Jaco at West Valley to Titus McCaleb "congratulations on your new position at Tesla Motors through West Valley Staffing Group", 10-19-2016 (McCaleb Depo Exhibit 3)		Titus McCaleb	Δ MIL 1, §3			
023	Expert report of Anthony Reading		Anthony Reading	Purported expert report is inadmissible hearsay not within any			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
				exception. FRE 801-802, 807.			
024	Amended report of Amy Oppenheimer		Amy Oppenheimer	Purported expert report is inadmissible hearsay not within any exception. FRE 801-802, 807.			
025	Tesla Personal Protective Equipment Reqs (Depo Exhibit 25)	TESLA-0000234-239	Annalisa Heisen		Authentic		
026	Personal Protective Equipment Program (Depo Exhibit 29)	TESLA-0000228-233	Romero		Authentic		
027	Tesla Workplace Violence Policy (Depo Exhibit 31)	TESLA-0000249 modified to Tesla 248-249	Annalisa Heisen		Authentic	Δ374 (agree to Δ #s)	
028	Tesla Anti-Harassment Policy (Depo Exhibit 32, 117)	TESLA-0000220	Annalisa Heisen		Authentic	Δ347 & Δ373	
029	Tesla Anti-Harassment Policy (Depo Exhibit 33, 118)	TESLA-0000217-219	Annalisa Heisen		Authentic	Δ368	
030	Owen Diaz email re Ramon threat, 10-17-2015	ODIAZ000003	Ed Romero or Tom Kawasaki		Authentic	Δ235	
031	Garrett email to Marconi Re Ramon threat, 10-20-2015 (Quintero Depo Exhibit 35)	TESLA-0000140-142	Wayne Jackson		Authentic	Δ240 (Δ is only 140-41)	
032	Parks email RE Rothaj Foster payroll, 10-27-2015 (Depo Exhibit 36)	TESLA-0000054-55	Ed Romero Wayne Jackson		Authentic	Δ250	
033	Fwd Racist Effigy and Drawing, 1-22-2016 (Depo Exhibit 37)	TESLA-0000035-37	Wayne Jackson		Authentic Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
034	Garrett email Re Racist Effigy and Drawing, 1-22-2016 (Depo Exhibit 38, 128)	TESLA-0000020-24	Wayne Jackson Use also with Quintero		Authentic Admissible	<a href="#">Δ274</a>	
035	Quintero email Re Racist Effigy and Drawing, 1-22-2016 (Depo Exhibit 39)	TESLA-0000025-29	Quintero		Authentic Admissible	<a href="#">Δ275</a>	
036	Elon Musk email Re Doing the Right Thing, 5-31-2017 (Depo Exhibit 40)		Victor Quintero	Δ MIL 2, §5			
037	Romero email Re Confidential elevator issues (owen), 8-1-2015 (Depo Exhibit 41)	TESLA-0000509	Ed Romero		Authentic Admissible		
038	Kawasaki email re confidential elevator issues (owen), 8-2-2015 (Depo Exhibit 42, 120)	TESLA-0000510	Tom Kawasaki		Authentic Admissible	<a href="#">Δ218</a>	
039	Romero email re Judy Tibreza (verbal warning), 8-4-2015 (Depo Exhibit 43, 121)	TESLA-0000511	Romero		Authentic Admissible		
040	Romero email Re Elevator confidential information, 8-4-2015 (Depo Exhibit 44, 122)	TESLA-0000512	Romero		Authentic Admissible	<a href="#">Δ219</a>	
041	Quintero email re Judy Tibreza (verbal warning), 8-4-2015 (Depo Exhibit 45)	TESLA-0000513	Quintero		Authentic Admissible	<a href="#">Δ220</a>	
042	Quintero email Re employee changes, 8-17-2015 (Depo Exhibit 46)	TESLA-0000518 <a href="#">modified to Tesla 518-520</a>	Quintero		Authentic	<a href="#">Δ222</a> (agree to Δ #s)	
043	Romero email re daily report, 8-27-2018 (Depo Exhibit 47)	TESLA-0000539	Kawasaki or Romero		Authentic		
044	Kawasaki email re Diaz letter of resignation – tesla motors, 9-18-2015 (Depo Exhibit 49)	TESLA-0000565-566	Kawasaki	Resignation of forklift driver irrelevant to Plaintiff's claims. FRE 401-402.			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
045	Quintero email re two week letter of resignation, 9-19-2015 (Depo Exhibit 50)	TESLA-0000568-569	Quintero	Resignation of forklift driver irrelevant to Plaintiff's claims. FRE 401-402.			
046	Quintero email to Wayne Jackson re two week letter of resignation, 9-21-2015 (Depo Exhibit 51)	TESLA-0000068-69	Quintero	Resignation of forklift driver irrelevant to Plaintiff's claims. FRE 401-402.			
047	Kawasaki response re elevator 2, 9-27-2015 (Depo Exhibit 52)	TESLA-0000576-577	Kawasaki		Authentic	<a href="#">Δ230</a>	
048	Quintero Re: night elevator lead, 10-19-2015 (Depo Exhibit 54)	TESLA-0000628	Romero		Authentic	<a href="#">Δ237</a>	
049	Romero email to Jackson re: Josue email: owen, 10-19-2015 (Depo Exhibit 55, 125)	TESLA-0000641	Romero		Authentic		
050	Garrett email re ramon, 10-20-2015 (Depo Exhibit 56)	TESLA-0000135-136	Wayne Jackson		Authentic		
051	Marconi email to Garrett re ramon, 10-20-2015 (Depo Exhibit 57)	TESLA-0000134	Ed Romero 189:9		Authentic Admissible		
052	Romeo email to Delagrande and Quintero re pwt dz, 10-23-2015 (Depo Exhibit 58)	TESLA-0000663	Romero		Authentic	<a href="#">Δ244</a>	
053	Romero email re rothaj foster, 10-24-2015 (Depo Exhibit 59)	TESLA-0000058	Romero		Authentic Admissible	<a href="#">Δ246</a> (Δ incl. dupl. p. 59)	

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
054	Delagrande to Romero re elevators/totes, 11-2-2015 (Depo Exhibit 61)	TESLA-0000666	Romero		Authentic	<a href="#">Δ251</a>	
055	nextsource – Rashad zaid – forklift to elevator candidate, 11-12-2015 (Depo Exhibit 68)	TESLA-0000049-50	Romero		Authentic		
056	elevator (forklift) operator (grave) – Eduardo Osorio, 12-2-2015 (Depo Exhibit 69)	TESLA-0000710-712	Romero		Authentic		
057	contractor email address request, 12-3-2015 (Depo Exhibit 70)	TESLA-0000717-718	Romero		Authentic	<a href="#">Δ260</a>	
058	Quintero email to Romero CC Neely re Tesla email, 12-14-2015 (Depo Exhibit 71)	TESLA-0000719	Quintero		Authentic		
059	one on one meeting, 12-22-2015 (Depo Exhibit 73)	TESLA-0000720	Romero		Authentic Admissible		
060	Monica De Leon email to Wismer Re Ramon, 1-25-2016 (Depo Exhibit 74)	CitiStaff-0000004-5	Monica DeLeon		Authentic		
061	Owen Diaz timestamped elevator scans (Depo Exhibit 76)	CitiStaff-0000105	Monica DeLeon		Authentic		
062	Candidate: Owen O. Diaz (Depo Exhibit 79)	TESLA-0000163-169	Owen or Monica DeLeon		Authentic		
063	General Assembly Instructions (Depo Exhibit 81)	TESLA-0000215-216	Romero or Quintero	Relevance; plaintiff did not work in General Assembly. FRE 401-403			
064	Owen Diaz – report, background report? (Depo Exhibit 85)	CitiStaff-0000022-23 <a href="#">modified to CS 22-33</a>	DeLeon		Authentic	<a href="#">Δ225</a> (Δ Incl. CS 22-33)	



EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
065	Pay Rate Increase, 2-2-2016 (Depo Exhibit 91)	CitiStaff-0000006-7	Monica DeLeon		Authentic		
066	Monica DeLeon email re Owen's bereavement leave, 3-3-2016 (Depo Exhibit 92)	CitiStaff-0000008	Monica DeLeon		Authentic	<a href="#">Δ302</a> (Note: CS 18 same as CS08)	
067	Antioch Health Center – Owen's off work note, 3-15-2016 (Depo Exhibit 93)	TESLA-0000003	Wayne Jackson (see Exh 140)	Rule of completeness, should include email (TESLA-0000002) for which exhibit was an attachment. FRE 106.			
068	Separation notice – Owen Diaz – 05/04/2016 – United States of America, 5-4-2016 (Depo Exhibit 96)	TESLA-0000144	Ed Romero or Annalisa Heisen		Authentic Admissible	<a href="#">Δ323</a>	
069	Tesla – Contractor EHS Guidelines (Depo Exhibit 99)	WV438	Kossayian	Unsigned guidelines not relevant to Plaintiff; produced by West Valley who did not employ Plaintiff. FRE 401-402.			
070	Titus McCaleb DFEH Charge of Discrimination (Depo Exhibit 111)	WV397	Kossayian at WV and Brandie To at Tesla	Δ MIL 1, §3			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
071	Titus McCaleb Report (Depo Exhibit 112)	WV467-494	Kossayian, Brandie To and McCaleb	Δ MIL 1, §3			
072	WVSG Response to EEOC re Titus McCaleb, 10-23-2017 (Depo Exhibit 113)	WV400-413	Kossayian	Δ MIL 1, §3			
073	Uhlenbrock email re Resume/Owen Diaz, 6-24-2015 (Depo Exhibit 119)	TESLA-0000062 modified to Tesla 62-65	Wayne Jackson		Authentic	Δ211(Δ Incl. T 62-65)	
074	Jackson to Gryske Re (redacted), 10-19-2015 (Depo Exhibit 124)	TESLA-0000635-636	Jackson		Authentic	Δ238	
075	Garrett to Marconi Re Ramon 10-20-2015 (Depo Exhibit 126, 185)	TESLA-0000133-136 modified to Tesla 133-142	Marconi Jackson		Authentic	Δ242(Δ Incl. T 133-142)	
076	Jackson to Garrett Re Employee Relations issue – Tesla, 10-21-2015 (Depo Exhibit 127)	TESLA-0000646-647	Jackson		Authentic		
077	Torres to Jackson re Racist Effigy & Drawing, 1-22-2016 (Depo Exhibit 129)	TESLA-0000009-12 modified to Tesla 9-13	Quintero		Authentic	Δ272(Δ Incl. T 9-13)	
078	Martinez to Jackson re Racist Effigy & Drawing, 1-22-2016 (Depo Exhibit 130)	TESLA-0000004-8	Jackson		Authentic	Δ271	
079	Wayne to Quintero re NextSource Ramon Martinez Status Update, 1-25-2016 (Depo Exhibit 132, 154, 184)	TESLA-0000730-731; TESLA-0000735-737; NS38-42	Jacki Delgado or Wayne Jackson	Rule of completeness. FRE 106. Must include statement from R. Martinez		Δ287 (Note: Π excludes statement)	
080	Quintero to Jackson, Torres and Laloh Re NextSource Ramon Martinez Status Update, 1-25-2016 (Depo Exhibit 133)	TESLA-0000738-739 modified to Tesla 738-740	Quintero		Authentic	Δ289(Δ Incl. T 738-740)	
081	Romero to Jackson Re FW Night Elevator Lead, 3-14-2016 (Depo Exhibit 137)	TESLA-0000329 modified to Tesla 328-329	Romero		Authentic	Δ306(Δ Incl. T 328-329)	

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
082	Romero to Jackson Re Owen Diaz Dr Note, 3-18-2016 (Depo Exhibit 139)	TESLA-0000333	Romero		Authentic		
083	Quintero to Romero Re Owen, 2-26-2016 (Depo Exhibit 142)	TESLA-0000752-753	Quintero		Authentic	<a href="#">Δ299</a>	
084	Defendant's objections to PMK video depo & (Depo Exhibit 143)		Heisen	Relevance. FRE 401-402.			
085	Tesla SOP of Inoperable Freight Elevator, 2-14-2015 (Depo Exhibit 144)	TESLA-0000769-770 <a href="#">modified to Tesla 769-771</a>	Romero		Authentic	<a href="#">Δ306</a> (Δ Incl. T 769-771)	
086	SOP Bldg services/Elevator Operators (Depo Exhibit 145)	TESLA-0000772-774	Romero		Authentic		
087	Work Instruction #2015-006-A (Depo Exhibit 146)	TESLA-0000771	Try Romero		Authentic		
088	Anti-Handbook Handbook (Depo Exhibit 147)	TESLA-0000805-808	Annalisa Heisen		Authentic		
089	Tesla Code of Bus Conduct & Ethics (Depo Exhibit 148)	TESLA-0000844-849	Heisen		Authentic		
090	Tesla Anti-Harassment and Discrimination Policy (Depo Exhibit 150)	TESLA-0000842-843	Heisen		Authentic	<a href="#">Δ348</a>	
091	Ramon Martinez (Redacted)doc (Depo Exhibit 153)	TESLA-0000863-878	Heisen		Authentic	<a href="#">Δ341</a>	
092	Kawasaki to Jackson re FWD Diaz re Ramon, 10-18-2015 (Depo Exhibit 155)	TESLA-0000061	Kawasaki		Authentic	<a href="#">Δ236</a> (Δ Incl. T061 & OD 03)	
093	Environment, Health and Safety Training Tesla (Depo Exhibit 158)	TESLA-0000250-277 <a href="#">modified to Tesla 250-293</a>	Quintero		Authentic	<a href="#">Δ350</a> (Δ Incl. T 250-293)	
094	(Redacted) Edward Romero HR Training docs (Depo Exhibit 160)	TESLA-0000825-841	Heisen		Authentic	<a href="#">Δ343</a>	
095	(redacted) Victor Quintero HR Training docs (Depo Exhibit 161)	TESLA-0000852-862	Heisen		Authentic	<a href="#">Δ340</a>	

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
096	Roberto Hurtado HR Training docs (Depo Exhibit 162)	TESLA-0000816-818	Heisen		Authentic		
097	Uhlenbrock to Fremontcontrolroom Requesting Badge for Owen Diaz, 6-2-2015 (Depo Exhibit 169)	NS008	McGinn, Kevin		Authentic		
098	Uhlenbrock to Quintero re response to Diaz transfer to lead elevator operator, 8-8-2015 (Depo Exhibit 173)	NS193	McGinn		Authentic		
099	Kawasaki to Uhlenbrock re Owen Diaz on Recycling Team Schedule as Elevator Oper., 8-18-2015 (Depo Exhibit 174)	NS160-162	McGinn or Kawasaki		Authentic		
100	Parks to Romero re Elevator Staff Raises 6:25pm Increasing O Diaz pay \$16 to \$18, 1-28-2016 (Depo Exhibit 178)	NS025	Romero		Authentic	<a href="#">Δ293</a> (Δ Incl. NS 25 & NS 21)	
101	Jackson to Romero re Owen Diaz Dr Note, 3-18-2016 (Depo Exhibit 179)	NS010 modified to NextSource 10-11	Wayne Jackson and Ed Romero		Authentic	<a href="#">Δ314</a> (Δ Incl. NS 10-11)	
102	Fremont badging to Jackson re Badge Deactivation for Owen Diaz, 3-18-2016 (Depo Exhibit 180)	NS034	Wayne Jackson		Authentic	<a href="#">Δ312</a> (Δ Incl. NS 34, 36)	
103	Garrett to Jackson Re Employee Relations Issue-Tesla, 10-20-2015 (Depo Exhibit 182, 191)	NS101 modified to NextSource 101-102	Jackson		Authentic	<a href="#">Δ239</a> (Δ Incl. NS 101-102)	
104	Floorplan schematic (Depo Exhibit 183)		Owen or Ed Romero		Authentic		
105	Brandie To email to Versteegh Re Incident Report, 4-13-2017 (Marconi Depo. Ex. 186) (Depo Exhibit 186)	TESLA-0000971-973	Brandie To or Titus McCaleb	Δ MIL 1, §3			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
106	Romero email to Jackson Re Personnel Issues (Marconi Depo. Ex. 187), 12-30-2015 (Depo Exhibit 187)	TESLA-0000906	Jackson and Romero	Δ MIL 2, §6			
107	Esquer email to Marconi Re unacceptable, 4-29-2016 (Marconi Depo. Ex. 188) (Depo Exhibit 188)	TESLA-0000916-918	Josh Hedges and Erin Marconi	Δ MIL 2, §2			
108	Mantz email to Crosby Re Jeff Henry Complaint, 12-16-2015 (Depo Exhibit 189)	TESLA-0001006-1009	Paul James Maggie Crosby and Josh Mantz	Δ MIL 2, §7			
109	Andres Donet email to Liza Lipson cc Quintero Re Racism writing the bathroom, 5-21-2016 (Depo Exhibit 193)	TESLA-0001003-1005	Donet	Δ MIL 2, §3			
110	Photo of n-word graffiti on a poster at the factory (Depo Exhibit 194)			Δ MIL 2, §4			
111	Paul James email to Erin Marconi re Threat Incident threat by Rothaj Foster to Owen Diaz, 11-6-2015	TESLA-0000131	Paul James and Erin Marconi		Authentic		
112	NextSource services agreement with Tesla, 5-24-2015 (DEF-91-102)		Bruce Wismer		Authentic		
113	Rovilla Wetle's Review of Tara Flynn's "Ninga", 4-14-2017 (Depo Exhibit 115)	WV-380-386	Rovilla Wetle	Δ MIL 2, §1			
114	Exterior of Tesla factory (no date, no Bates)				As demonstrative		
115	Aerial view of Tesla factory – Front (no date, no Bates)				As demonstrative		
116	Tesla factory map (no date, no Bates)			FRE 401-402, date of map not known to be during time of Plaintiff's work			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
117	Interior of Tesla factory – Fremont, CA (no date, no Bates)				As demonstrative		
118	Interior of Tesla factory – Forklift (no date, no Bates)				As demonstrative		
119	Interior of Tesla factory – Parts (no date, no Bates)				As demonstrative		
120	Interior of Tesla factory – Assembly Line (no date, no Bates)				As demonstrative		
121	Interior of Tesla factory – Trim Line before and after (no date, no Bates)				As demonstrative		
122	Email exchange from Ed Romero to Wayne Jackson and Victor Quintero re Rothaj Foster threat toward Owen Diaz, 11-6-2015 (Depo Exhibit 65)	TESLA-127-128			Authentic		
200	Owen Diaz resume (No Date) (Owen Diaz Depo Exhibit 32)	ODIAZ000181-184; ODIAZ000387-391	O. Diaz	No Objection	Admissible		
201	Owen Diaz resume (no date), Demetric Di-az resume (no date) (Deleon Depo Exhibit 75) (Owen Diaz Depo Exhibit 2) (D. Di-az Depo Exhibit 6)	TESLA-0000153-156	O. Diaz	Relevance; Undue time, Evid. C. 403; cumulative; authenticity			
202	Standard Operating Procedure (SOP): Elevator 1 & 2 - Building Services I Elevator Operators (no date) (A. Heisen Depo Exhibit 145)	TESLA-0000713-716	E. Romero V. Quintero	No Objection	Admissible		
203	Email re Elevator Pay Increases, 1-26-2015 (K. McGinn Depo Exhibit 176)	NS000023-24; NS000033	E. Romero	Relevance; Evid. C. 403 MIL #5	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
204	Owen Diaz Job Application to CitiStaff, 6-2-2015 (Owen Diaz Depo Exhibit 1)	CitiStaff-0000034-35	O. Diaz M. DeLeon	Relevance	Authentic		
205	CitiStaff Assignment Abandonment/Walk-Off Policy, signed by Owen Diaz, 6-2-2015 (Owen Diaz Depo Exhibit 3)	CitiStaff -000039	O. Diaz M. DeLeon	Relevance; Evid. C. 403; Redundant of Ex. 206	Authentic		
206	CitiStaff Employee Safety Orientation Sign-Off Sheet, Assignment Abandonment, Safety Quiz, General Code of Safe Practices, Weapons-Free Workplace, Sexual Harassment Policy, Drug and Alcohol Use Policy, Meals and Breaks Policy, Signed by Owen Diaz, 6-2-2015	CitiStaff-0000038-46	O. Diaz M. DeLeon	Relevance; Evid. C. 403	Authentic		
207	W-4 Form for Owen Diaz, 6-2-2015	CitiStaff-0000036-37	O. Diaz M. DeLeon	Relevance	Authentic		
208	Email re Requesting Badge/ Owen Diaz, 6-3-2015 (K. McGinn Depo Exhibit 169)	NS000179			Admissible		
209	Email re Owen Diaz, 6-6-2015	NS000149			Admissible		
210	Email re Owen's Resume.docx, 6-17-2015	NS000159			Admissible		
211	Email re Owen's Resume.docx, 6-17-2015	TESLA-0000062-65	W. Jackson		Admissible		
212	Email re elevator 1, 6-19-2015	TESLA-0000487-488			Admissible		
213	Email re Owen, 6-22-2015	NS000009			Admissible		
214	Email re Resume/Owen Diaz, 6-25-2015 (W. Jackson Depo Exhibit 119)	NS000163	W. Jackson		Admissible		
215	Email re Elevator #1 and #2 Employee and Lead schedule, 7-1-2015	TESLA-0000495-497	T. Kawasaki		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
216	Email re Meeting, 11-7-2015 (E. Romero Depo Exhibit 66)	TESLA-0000704-709	E. Romero		Admissible		
217	Email re FW: Tesla Motors: Health & Safety Report – 13962, 7-23-2015	TESLA-0000498-502	V. Quintero		Admissible		
218	Email re Confidential Elevator Issues (Owen), 8-2-2015 (W. Jackson Depo Exhibit 120) (E. Marconi Depo Exhibit 42) (E. Romero Depo Exhibit 42)	TESLA-0000510	V. Quintero E. Romero T. Kawasaki		Admissible		
219	Email re Elevator confidential information, 8-4-2015 (W. Jackson Depo Exhibit 122) (E. Marconi Depo Exhibit 122) (E. Romero Depo Exhibit 44)	TESLA-0000512	E. Romero T. Kawasaki		Admissible		
220	Email re Judy Tibreza (sic) (Verbal Warning), 8-4-2015 (E. Marconi Depo Exhibit 45) (E. Romero Depo Exhibit 45)	TESLA-0000513	E. Romero V. Quintero		Admissible		
221	Direct Deposit Enrollment/Cancel Form for Owen Diaz, 8-15-2015 (Deleon Depo Exhibit 87)	CitiStaff-0000048	O. Diaz M. DeLeon	Relevance; Evid. C. 403; Privacy (Bank Info)	Authentic		
222	Email re Employee Changes, 8-17-2015 (E. Romero Depo Exhibit 46)	TESLA-0000518-520	V. Quintero E. Romero		Admissible		
223	Email re Employee Changes, 8-18-2015 (K. McGinn Depo Exhibit 173)	NS000193-194	V. Quintero E. Romero		Admissible		
224	Email re Owen Diaz/Pay Increase, 8-23-2015	NS000166	M. DeLeon		Admissible		
225	Background check of Owen Diaz by Citistaff, 8-24-2015 (Deleon Depo Exhibit 85)	CitiStaff-0000022-33	O. Diaz M. DeLeon	Relevance; Evid. C. 403;	Authentic		
226	Email re OPS Meeting, 9-10-2015	NS000046-81	V. Quintero		Admissible		



EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
			E. Romero W. Jackson				
227	Email re Daily log binder, 9-16-2015 (E. Romero Depo Exhibit 48)	TESLA-0000557	V. Quintero E. Romero T. Kawasaki	Relevance; Evid. C. 403;	Authentic		
228	Email re Two Week Letter of Resignation, 9-18-2015	ODIAZ000207-208	O. Diaz		Admissible		
229	Email re Hilda/Aron, 9-20-2015 (Owen Diaz Depo Exhibit 7)	TESLA-0000570	O. Diaz T. Kawasaki		Admissible		
230	Email re Elevator 2, 9-27-2015 (E. Romero Depo Exhibit 52)	TESLA-0000576-577	V. Quintero E. Romero T. Kawasaki		Admissible		
231	Time clock punches for Owen Diaz, 10-1-2015 to 3-13-2016	CitiStaff-0000105	M. DeLeon	Duplicate?	Admissible		
232	Email re Owen Diaz – Verbal Warning, 10-2-2015 (Owen Diaz Depo Exhibit 6) (E. Romero Depo Exhibit 53)	TESLA-0000308-309	V. Quintero E. Romero	Relevance; Evid. C. 403 MIL #5	Authentic		
233	Email re Forklift PPE, 10-13-2015	TESLA-0000612-613	V. Quintero E. Romero	Relevance; Hearsay; Foundation; Incomplete, Vague and Ambiguous; Evid. C. 403 MIL #5	Authentic		
234	Email re Owen, 10-17-2015	TESLA-0000626	E. Romero		Admissible		
235	Email re Ramon, 10-17-2015 (E. Marconi Depo Exhibit 34)	ODIAZ000003	O. Diaz E. Romero T. Kawasaki		Admissible		
236	Email re Ramon, 10-18-2015 (Owen Diaz Depo Exhibit 8) (A. Heisen Depo	TESLA-0000061, ODIAZ0000003	O. Diaz E. Romero		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
	Exhibit 155) (E. Marconi Depo Exhibit 55) (V. Quintero Depo Exhibit 34)		T. Kawasaki W. Jackson				
237	Email re Night Elevator Lead, 10-19-2015 (E. Romero Depo Exhibit List 54)	TESLA-0000628	V. Quintero E. Romero W. Jackson T. Kawasaki		Admissible		
238	Email with redactions, 10-19-2015 (W. Jackson Depo Exhibit 124)	TESLA-0000635-636	W. Jackson		Admissible		
239	Email re Employee Relations issue – Tesla, 10-20-2015 (E. Marconi Depo Exhibit 191) (K. McGinn Depo Exhibit 182)	NS000101-102	W. Jackson		Admissible		
240	Email re Ramon, 10-20-2015 (E. Marconi Depo Exhibit 35) (V. Quintero Depo Exhibit 35)	NS000108-111; TESLA-0000140-141	E. Marconi		Admissible		
241	Email re Ramon, 10-20-2015	TESLA-0000060-61; TESLA-0000066-67	O. Diaz E. Romero W. Jackson		Admissible		
242	Email re Ramon, 10-20-2015	TESLA-0000133-142	E. Marconi		Admissible		
243	Access Denied, Granted and Other Badge Events Chart for O. Diaz for the dates of 6/3/15 to 3/13/16, 10-21-2015 (Deleon Depo Exhibit 78)	TESLA-0000412-421	M. DeLeon	Relevance; Authenticity; Foundation; Evid. C. 403, cumulative			
244	Email re PWT DZ, 10-23-2015 (E. Romero Depo Exhibit 58)	TESLA-0000663	V. Quintero E. Romero J. Delagrande		Admissible		
245	Email re Rothja Foster, 10-24-2015	ODIAZ000206-209	O. Diaz V. Quintero E. Romero		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
246	Email re Rothja Foster, 10-24-2015 (E. Romero Depo Exhibit 59)	TESLA-0000058-59	O. Diaz V. Quintero E. Romero W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		
247	Email re Rothja Foster, 10-25-2015	TESLA-0000056	O. Diaz V. Quintero E. Romero	Relevance; Evid. C. 403; MIL #4	Authentic		
248	Email re Rothja Foster, 10-26-2015	ODIAZ000204-205	O. Diaz E. Romero W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		
249	Email re Rothja Foster, 10-26-2015	TESLA-0000056	O. Diaz E. Romero W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		
250	Email re Rothja Foster - Payroll Exception, 10-27-2015 (DeLeon Depo Exhibit 97) (V. Quintero Depo Exhibit 36)	TESLA-0000054-55	M. DeLeon W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		
251	Email re Elevators/Totes, 11-2-2015 (E. Romero Depo Exhibit 61)	TESLA-0000666	V. Quintero E. Romero J. Delagrande		Admissible		
252	Email re Elevator 1 out of service, 11-5-2015 (E. Romero Depo Exhibit 63)	TESLA-0000051-52	O. Diaz V. Quintero E. Romero W. Jackson	Relevance; Evid. C. 403;	Authentic		
253	Email re Mr. Foster, 11-5-2015 (Owen Diaz Depo Exhibit 11)	TESLA-0000053	O. Diaz W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		
254	Email re Rothaj Foster, 11-6-2015	NS000136-137	V. Quintero E. Romero W. Jackson	MIL #4	Authentic (If we lose MIL #4, agree admissible)		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
255	Email re Rothaj Foster, 11-6-2015	TESLA-0000125-130	V. Quintero E. Romero W. Jackson E. Marconi	MIL #4	Authentic (If we lose MIL #4, agree admissible)		
256	Email re Rothaj Foster, 11-6-2015 (A. Heisen Depo Exhibit 156)	TESLA-0000702-703	V. Quintero E. Romero	MIL #4	Authentic (If we lose MIL #4, agree admissible)		
257	Email re Termination of Rothaj Foster, 11-6-2015 (E. Romero Depo Exhibit 64)	CitiStaff-0000011-13	M. DeLeon W. Jackson	Relevance; Double Hearsay; Evid. C. 403; MIL #4	Authentic		
258	Email re termination of Rothaj Foster, 11-6-2015	NS000012-13	M. DeLeon W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
259	Email re Meeting, 11-9-2015 (E. Romero Depo Exhibit 67)	TESLA-0000708-709	V. Quintero E. Romero J. Delagrande		Admissible		
260	Email re Contractor email address request, 12-3-2015 (E. Romero Depo Exhibit 70)	TESLA-0000717-718	V. Quintero E. Romero		Admissible		
261	Owen Diaz application for Warehouse Associate at Bay List on Indeed, 12-3-2015 (Owen Diaz Depo Exhibit 39)	ODIAZ000162-163	O. Diaz	Relevance; Evid. C. 403;	Authentic		
262	Owen Diaz application for Warehouse Night Worker at P&R Paper Supply Company on Indeed, 12-7-2015 (Owen Diaz Depo Exhibit 40)	ODIAZ000168-169	O. Diaz	Relevance; Evid. C. 403;	Authentic		
263	Email re Forklift (Elevator) Operator Position - NextSource/Tesla Motors, 12-15-2015	TESLA-0000310	L. Patterson		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
264	Lamar Patterson resume (no date)	TESLA-0000407	O. Diaz L. Patterson	Relevance; Foundation; Evid. C. 403;			
265	Email re Resume, 12-15-2015 and resume of Lamar Patterson	ODIAZ000201-203	O. Diaz L. Patterson	Relevance	Authentic		
266	Email re One on One Meetings, 12-22-2015	ODIAZ000196	O. Diaz V. Quintero E. Romero	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
267	Owen Diaz application for Production Operator at Select Staffing on Indeed, 1-2-2016 (Owen Diaz Depo Exhibit 42)	ODIAZ000133-134	O. Diaz	Relevance; Evid. C. 403;	Authentic		
268	Owen Diaz application for Unit Clerk at Allied Health Group on Indeed, 1-2-2016 (Owen Diaz Depo Exhibit 41)	ODIAZ000168-169	O. Diaz	Relevance; Evid. C. 403;	Authentic		
269	Chartwell Staffing Solutions Alleged Victim Investigation Questions for Ramon Martinez, 1-22-2016	NS000043-45	J. Delgado V. Martinez	Relevance; Authenticity; Foundation; Hearsay; Evid. C. 403; MIL #3 Plaintiff asks to see the original			
270	Email re FW: Racist effigy & drawing, 1-22-2016	NS000095-100; NS000103-107	W. Jackson		Admissible		
271	Email re Racist effigy & drawing, 1-22-2016 (Owen Diaz Depo Exhibit 14) (W. Jackson Depo Exhibit 130) (L. Ledesma Depo Exhibit 165)	TESLA-0000004-8	J. Delgado W. Jackson V. Martinez		Admissible		
272	Email re Racist effigy & drawing, 1-22-2016 (W. Jackson Depo Exhibit 129) (E. Marconi Depo Exhibit 129)	TESLA-0000009-13	V. Quintero W. Jackson		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
273	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000015-19	V. Quintero W. Jackson		Admissible		
274	Email re Racist effigy & drawing, 1-22-2016 (W. Jackson Depo Exhibit 128) (E. Marconi Depo Exhibit 128) (V. Quintero Depo Exhibit 38)	TESLA-0000020-24	W. Jackson		Admissible		
275	Email re Racist effigy & drawing, 1-22-2016 (E. Marconi Depo Exhibit 39) (V. Quintero Depo Exhibit 39)	TESLA-0000025-29	V. Quintero W. Jackson		Admissible		
276	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000030-34	W. Jackson		Admissible		
277	Email re Racist effigy & drawing, 1-22-2016 (E. Marconi Depo Exhibit 37)	TESLA-0000035-38	O. Diaz W. Jackson E. Romero		Admissible		
278	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000070-74	V. Quintero W. Jackson		Admissible		
279	Email re Racist effigy & drawing, 1-22-2016 (Owen Diaz Depo Exhibit 18)	TESLA-0000085-88	V. Martinez W. Jackson		Admissible		
280	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000089-93	W. Jackson		Admissible		
281	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000094-97	V. Quintero W. Jackson		Admissible		
282	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000102-105	O. Diaz W. Jackson		Admissible		
283	Email re Racist effigy & drawing, 1-22-2016	TESLA-0000726-729	V. Quintero W. Jackson		Admissible		
284	Email re Racist effigy & drawing, 1-23-2016 (W. Jackson Depo Exhibit 126) (E. Marconi Depo Exhibit 126) (K. McGinn Depo Exhibit 175)	NS000133-135	V. Quintero E. Romero W. Jackson		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
285	Chartwell Staffing Solutions Alleged Victim Investigation Questions for Owen Diaz, 1-25-2016	NS000040-42	O. Diaz J. Delgado V. Martinez	Plaintiff asks to see the original	Admissible		
286	Email re NextSource and statements of R. Martinez and O. Diaz, 1-25-2016	NS000082-89	J. Delgado V. Martinez W. Jackson	Authenticity; Foundation; Hearsay; MIL #3 as to NS 87-89; Plaintiff asks to see the original	Admissible as to NS 82-86		
287	Email re NextSource Ramon Martinez Status Update and statements of R. Martinez and O. Diaz, 1-25-2016 (A. Heisen Depo Exhibit 154) (W. Jackson Depo Exhibit 132) (E. Marconi Depo Exhibit 132)	TESLA-0000730-737	V. Quintero W. Jackson	Authenticity; Foundation; Hearsay; MIL #3 as to Tesla 732-734; Plaintiff asks to see the original	Admissible as to Tesla 731-732, 735-737		
288	Email re NextSource Ramon Martinez Status Update, 1-25-2016 (Owen Diaz Depo Exhibit 38)	NS000038-39	V. Quintero W. Jackson		Admissible		
289	Email re NextSource Ramon Martinez Status Update, 1-25-2016 (W. Jackson Depo Exhibit 133)	TESLA-0000738-740	V. Quintero W. Jackson		Admissible		
290	Email re Ramon, 1-25-2016 (DeLeon Depo Exhibit 74) (E. Romero Depo Exhibit 74)	CitiStaff-0000014	M. DeLeon		Admissible		
291	Email re Ramon, 1-25-2016; Email re Pay Rate Increase, 2-2-2016; Email re Owen Diaz, 3-3-2016 (Owen Diaz Depo Exhibit 35)	CitiStaff-0000014-18	M. DeLeon	Cumulative – Duplicates 290			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
292	Email re Racist effigy & drawing, 1-26-2016 (DeLeon Depo Exhibit 90) (Owen Diaz Depo Exhibit 15 and 34) (W. Jackson Depo Exhibit 131)	CITISTAFF-0000050-55	M. DeLeon		Admissible		
293	Email re Elevator Staff Raises, 1-28-2016 (K. McGinn Depo Exhibit 178)	NS000021; NS000025	V. Quintero E. Romero W. Jackson		Admissible		
294	Owen Diaz application for Production Operator at Select Staffing on Indeed, 1-28-2016 (Owen Diaz Depo Exhibit 43)	ODIAZ000131-132	O. Diaz	Relevance; Evid. C. 403;	Authentic		
295	Email re Pay Rate Increase, 2-2-2016 (DeLeon Depo Exhibit 91) (Owen Diaz Depo Exhibit 19)	CitiStaff-0000007; CitiStaff-0000016-17	M. DeLeon		Admissible		
296	Email re Elevator team end of week, 2-19-2016	TESLA-0000741-743	V. Quintero E. Romero	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
297	Email re Elevator team end of week, 2-19-2016	TESLA-0000744-746	V. Quintero E. Romero J. Delagrande	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
298	Email re Owen, 2-26-2016	TESLA-0000750-762	J. Delagrande E. Romero	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
299	Email re Owen, 2-26-2016 (W. Jackson Depo Exhibit 142)	TESLA-0000752-753	V. Quintero E. Romero J. Delagrande	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
300	Email re Owen, 2-29-2016 (Owen Diaz Depo Exhibit 20)	TESLA-0000314-316	V. Quintero E. Romero J. Delagrande	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		



EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
301	Email re Owen Diaz and Troy Dennis, 3-2-2016 (Owen Diaz Depo Exhibit 21) (W. Jackson Depo Exhibit 134)	TESLA-0000317	V. Quintero E. Romero W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
302	Email re Owen Diaz, 3-3-2016 (Deleon Depo Exhibit 92) (Owen Diaz Depo Exhibit 22)	CitiStaff-0000008; CitiStaff-0000018	M. DeLeon		Admissible		
303	Email re Owen, 3-4-2016	TESLA-0000321-327	V. Quintero E. Romero J. Delagrande	Relevance; Evid. C. 403; MIL #4	Authentic		
304	Email re Safety Shoes, 3-4-2016 (W. Jackson Depo Exhibit 135 and 136)	TESLA-0000318-320	E. Romero	Relevance; Evid. C. 403; MIL #4	Authentic		
305	Email re March 9, 10 & 11, 3-5-2016 (Owen Diaz Depo Exhibit 24)	TESLA-0000001	O. Diaz E. Romero		Admissible		
306	Email re Night Elevator Lead, 3-11-2016 (Owen Diaz Depo Exhibit 25) (W. Jackson Depo Exhibit 137)	TESLA-0000328-329	V. Quintero E. Romero W. Jackson		Admissible		
307	Screenshot of Temp Plus Program for Owen Diaz, 3-13-2016 (Deleon Depo Exhibit 84)	CitiStaff-0000021	M. DeLeon	Relevance; Foundation; Authenticity; Evid. C. 403			
308	Email re Owen Diaz, 3-17-2016 (Owen Diaz Depo Exhibit 26) (W. Jackson Depo Exhibit 138)	TESLA-0000330-331	E. Romero W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
309	Owen Diaz application for Apartment Maintenance Technician and Porters on Indeed, 3-17-2016 (Owen Diaz Depo Exhibit 45)	ODIAZ000016-17	O. Diaz	Relevance; Evid. C. 403;	Authentic		
310	Owen Diaz application for Janitorial Technician at Fitness Evolution NorCal	ODIAZ000090-91	O. Diaz	Relevance; Evid. C. 403;	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
	on Indeed, 3-17-2016 (Owen Diaz Depo Exhibit 45)						
311	Owen Diaz application for Maintenance Custodian at Carondelet High School on Indeed, 3-17-2016 (Owen Diaz Depo Exhibit 44)	ODIAZ000105-106	O. Diaz	Relevance; Evid. C. 403;	Authentic		
312	Email re Badge Deactivation for Owen Diaz, 3-18-2016 (K. McGinn Depo Exhibit 180)	NS000034; NS000036	E. Romero W. Jackson	Relevance; Evid. C. 403;	Authentic		
313	Email re Doctor took me off work, 3-18-2016 (Owen Diaz Depo Exhibit 27)	TESLA-0000002-3	O. Diaz W. Jackson	Relevance; Evid. C. 403;	Authentic		
314	Email re Owen Diaz Doctors Note, 3-18-2016 (K. McGinn Depo Exhibit 179)	NS000010-11	E. Romero W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
315	Email re Owen Diaz Doctors Note, 3-18-2016	NS000014	W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
316	Email re Owen Diaz Doctors Note, 3-18-2016	NS000020	E. Romero W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
317	Email re Owen Diaz Doctors Note; W. Jackson is asked to inform Owen his assignment has ended, 3-18-2016	NS000026-27	W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		
318	Email re Owen Diaz Doctors Note; NextSource terming Owen from its systems with no final hours, 3-18-2016 (K. McGinn Depo Exhibit 181)	NS000028-29	W. Jackson	Relevance; Evid. C. 403; MIL #4	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
319	Email re Owen Diaz Doctors Note, 3-18-2016	NS000030-31	E. Romero W. Jackson	Relevance; Evid. C. 403;	Authentic		
320	Email re Term of contract for Owen Diaz, 3-18-2016	NS000037	M. DeLeon W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
321	Email re Term of contract for Owen Diaz, 3-18-2016 (DeLeon Depo Exhibit 94) (W. Jackson Depo Exhibit 140)	CitiStaff-0000009-10; CitiStaff-00000019-20; NS000035	M. DeLeon W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
322	Email re 3-23-16 Ops Meeting Notes, 3-23-2016	NS000090-94; NS000119-123	W. Jackson	Relevance; Foundation; Hearsay; Evid. C. 403; Incomplete; Plaintiff asks to see the original	Authentic		
323	Email re FYI: Separation Notice - Owen Diaz [C] – 05-04-2016, 5-4-2016	TESLA-0000144	E. Marconi A. Heisen		Admissible		
324	Email re Michael Wheeler, 5-4-2016	NS000032	V. Quintero		Admissible		
325	Email re Michael Wheeler, 5-4-2016	TESLA-0000763	V. Quintero		Admissible		
326	Email re Elevator #1 Timeline (6/24/16), 6-28-2016	TESLA-0000339-344	V. Quintero E. Romero W. Jackson	Relevance; Hearsay; Evid. C. 403;	Authentic		
327	Email re Incident Report for Lamar Patterson, 6-30-2016	TESLA-0000347-348	V. Quintero E. Romero	Relevance; Hearsay; Evid. C. 403;	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
328	Email re Re-certification, 7-14-2016	TESLA-0000349-353	E. Romero W. Jackson		Admissible		
329	Email re Lamar Patterson - Rotor Damage by Elevator Operator - follow up, 8-12-2016	TESLA-0000365-373	V. Quintero E. Romero	Relevance; Hearsay; Evid. C. 403;	Authentic		
330	Email re Rotor Damage by Elevator Operator, 8-12-2016	TESLA-0000354-359	V. Quintero E. Romero	Relevance; Hearsay; Evid. C. 403;	Authentic		
331	Indeed Job applications for Owen Diaz, 9-21-2016 (Owen Diaz Depo Exhibit 30)	ODIAZ000010-180	O. Diaz	Relevance; Evid. C. 403;	Authentic		
332	Email re Incident Report for Lamar Patterson, 6-29-2016	TESLA-0000345-346	E. Romero W. Jackson	Relevance; Evid. C. 403;	Authentic		
333	Email re Lamar Patterson, 10-20-2016	TESLA-0000394-396	V. Quintero E. Romero W. Jackson V. Martinez	Relevance; Hearsay; Evid. C. 403;	Authentic		
334	Email re Lamar Patterson Elevator, 11-2-2016	TESLA-0000397	V. Quintero E. Romero W. Jackson	Relevance; Hearsay; Evid. C. 403;	Authentic		
335	Email re Termination of Rothaj Foster, 11-6-2015 (Deleon Depo Exhibit 88)	CitiStaff-0000001-5	M. DeLeon W. Jackson	Relevance; Hearsay; Evid. C. 403; MIL #4	Authentic		
336	AC Transit Letter to Owen Diaz re Bus Operator Recruitment #16-00096, Paycheck Data for Owen Diaz, W-2		O. Diaz	Relevance; Evid. C. 403;	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
	Wage and Tax Statement for Owen Diaz, 2-21-2017 (Owen Diaz Depo Exhibit 31)			Financial Privacy			
337	Screenshots of Tesla employee profile for Lamar Patterson and performance rating spreadsheet, 6-9-2017 (L. Patterson Depo Exhibit 5)	TESLA-0000398-406	L. Patterson E. Marconi A. Heisen	Relevance; Evid. C. 403; Foundation; Authenticity			
338	Check report history for Owen Diaz, 1-9-2018 (DeLeon Depo Exhibit 77)	CitiStaff-0000056-59	M. DeLeon	Relevance; Evid. C. 403; Financial Privacy	Authentic		
339	Paystubs for Owen Diaz, 4-27-2018	ODIAZ000185-188	O. Diaz	Relevance; Evid. C. 403; Financial Privacy	Authentic		
340	Victor Quintero employee training log (no date) (A. Heisen Depo Exhibit 161)	TESLA-0000852-562	V. Quintero A. Heisen E. Marconi		Admissible		
341	Ramon Martinez employee training log (no date) (A. Heisen Depo Exhibit 153)	TESLA-0000863-878	A. Heisen E. Marconi		Admissible		
342	Edward Romero employee training log (no date) (T. Kasabian Depo Exhibit 99)	TESLA-0000803	E. Romero A. Heisen E. Marconi		Admissible		
343	Edward Romero employee training log (no date) (A. Heisen Depo Exhibit 160)	TESLA-0000825-841	E. Romero A. Heisen E. Marconi		Admissible		
344	Citistaff Employee Handbook (DeLeon Depo Exhibit 82) (Owen Diaz Depo Exhibit 4)	DEF 000001-45	M. DeLeon	Relevance; Hearsay; Evid. C. 403;	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
345	Citistaff Employee Handbook	DEF 000046-90	M. DeLeon	Relevance; Hearsay; Evid. C. 403;	Authentic		
346	Excerpt from PowerPoint presentation “Environment, Health and Safety Training” (A. Heisen Depo Exhibit 159)	TESLA-0000265	A. Heisen E. Marconi		Authentic		
347	Tesla Internal Anti-Harassment /Discrimination Policy (no date)	TESLA-0000220	A. Heisen E. Marconi		Authentic		
348	Tesla’s Anti-Harassment/Discrimination policy (no date) (A. Heisen Depo Exhibit 150)	TESLA-0000842-843	A. Heisen E. Marconi		Authentic		
349	West Valley Staffing Group Staffing Services Agreement for Tesla Motors, 1-31-2013 (R. Wetle Depo Exhibit 2)	WV000051-63		Relevance; Hearsay; Evid. C. 403;	Authentic		
350	Environment, Health and Safety Training presentation, 2014 (D. Di-az Depo Exhibit 25)	TESLA-0000250-293			Admissible		
351	NextSource Employee Handbook, 9-9-2015 (K. McGinn Depo Exhibit 168)	NS000223-268	W. Jackson	Relevance; Hearsay; Evid. C. 403;	Authentic		
352	2015 Employee Development Plan, Standard Operating Procedure, Inoperable Freight Elevator, 7-26-2016 (A. Heisen Depo Exhibit 144 and 146)	TESLA-0000769-771	V. Quintero E. Romero		Admissible		
353	Tesla’s Code of Business Conduct and Ethics, 12-12-2017	TESLA-0000809-815	A. Heisen E. Marconi		Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
354	Tesla's Integrity Line/Tesla Internal, 2-14-2018 (D. Di-az Depo Exhibit 24) (A. Heisen Depo Exhibit 157)	TESLA-0000243-247	A. Heisen E. Marconi	Relevance; Foundation;	Authentic		
355	NextSource Responses to Owen Diaz's Interrogatories – SET ONE			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations	Admissible as to reading Interrogatory 1 & 3, 3 (sic)		
356	Owen Diaz's Responses to CitiStaff's Interrogatories – SET ONE			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations and subject to MIL #5	Authentic		
357	Owen Diaz's Responses to Tesla's Interrogatories – SET ONE			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations and subject to MIL #5	Authentic		
358	Owen Diaz's Responses to Tesla's Supplemental Interrogatories – SET ONE			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations	Authentic		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
359	Demetric Di-Az's Responses to NextSource's Interrogatories – SET ONE			Relevance; Hearsay; Evid. C. 403;	Authentic		
360	Demetric Di-Az's Responses to NextSource's Interrogatories – SET TWO			Relevance; Hearsay; Evid. C. 403;	Authentic		
361	Owen Diaz's Responses to NextSource's Interrogatories – SET ONE			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations	Authentic		
362	Owen Diaz's Responses to NextSource's Interrogatories – SET TWO			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations	Authentic		
363	Owen Diaz's Responses to NextSource's Requests for Admissions – SET ONE			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations	Authentic		
364	Owen Diaz's Responses to NextSource's Requests for Admissions – SET TWO			Relevance; Hearsay; Evid. C. 403; These are subject to Discovery Designations	Authentic		



EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
365	Javier Caballero employee training log (no date) (A. Heisen Depo Exhibit 152)	TESLA-0000879-888	A. Heisen E. Marconi	Relevance; Hearsay; Evid. C. 403; Authenticity; Foundation	Authentic		
366	Photos of Tesla Body Center Poster of PPE Equipment and vending machines (no date) (D. Di-az Depo Exhibit 26)	TESLA-0000209-210	V. Quintero E. Romero		Admissible		
367	Production Associate Job Description	WV000064-65		Relevance; Hearsay; Evid. C. 403;	Authentic		
368	Tesla's Anti-Harassment/Discrimination policy (no date) (Caballero Depo Exhibit 33) (D. Di-az Depo Exhibit 20) (W. Jackson Depo Exhibit 118)	TESLA-0000217-219	A. Heisen E. Marconi		Admissible		
369	Email re Dates at Tesla, 10-5-2015 (R. Wetle Depo Exhibit 3)	WV000137-138		Relevance; Hearsay; Evid. C. 403;	Authentic		
370	Email re Demetric Di-az, 10-11-2015	WV000092-94		Relevance; Hearsay; Evid. C. 403;	Authentic		
371	Email re Demetric Di-az, 10-20-2015 (R. Wetle Depo Exhibit 13)	WV000098-99		Relevance; Hearsay; Evid. C. 403;	Authentic		
372	Email re Demetric Di-az, 10-22-2015	WV000109		Relevance; Hearsay; Evid. C. 403;	Authentic		
373	Safety page from Tesla website, 2-14-2018 (Caballero Depo Exhibit 32) (W. Jackson Depo Exhibit 117)	TESLA-0000220	A. Heisen E. Marconi	Duplicates Exhs. 28, 347	Admissible		

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
374	Tesla's Workplace Violence Policy Memo, 2-14-2018 (Caballero Depo Exhibit 31)	TESLA-0000248-249	A. Heisen E. Marconi		Admissible		
375	Criminal charges for D. Di-az, 2-6-2019	TESLA-0001051-1116	D. Di-az	Relevance; Hearsay; Evid. C. 403; Foundation; Authenticity; Not Produced in Discovery; Improper Impeachment; Plaintiff asks to see the original			
376	Certified copy of Demetric Di-az's conviction, 6-1-2016		D. Di-az	Relevance; Hearsay; Evid. C. 403; Foundation; Authenticity; Not Produced in Discovery; Improper Impeachment; Plaintiff asks to see the original			
377	Certified copy of Demetric Di-az's criminal file, 2-6-2019		D. Di-az	Relevance; Hearsay; Evid. C. 403; Foundation; Authenticity; Not Produced in Discovery;			

EX. No.	Document Description	Bates Range(s)	Witness Associated	Objection(s) & Party	Stipulation – Admissibility	Date Identified	Date Admitted
				Improper Impeachment; Plaintiff asks to see the original			
378	Certified copy of Demetric Di-az's plea agreement entered into on March 12, 2020		D. Di-az	Relevance; Hearsay; Evid. C. 403; Foundation; Authenticity; Not Produced in Discovery; Improper Impeachment; Plaintiff asks to see the original			
379	Reserved for Demonstrative Exhibit						
380	Reserved for Demonstrative Exhibit						
381	Reserved for Demonstrative Exhibit						
382	Reserved for Demonstrative Exhibit						
383	Reserved for Demonstrative Exhibit						

CALIFORNIA CIVIL RIGHTS LAW GROUP  
ALEXANDER KRAKOW + GLICK LLP

DATED: April 27, 2020

By:                     //s//                      
Lawrence A. Organ, Esq.  
J. Bernard Alexander, Esq.  
Navruz Avloni, Esq.  
Cimone A. Nunley, Esq.

Attorneys for Plaintiff OWEN DIAZ

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

DATED: April 27, 2020

Bv     //s//      
TRACEY A. KENNEDY  
PATRICIA M. JENG

Attorneys for Defendant  
TESLA, INC. dba TESLA MOTORS, INC.